

**IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA  
Richmond Division**

	)	
	)	
BARBARA H. LEE, et al.,	)	
	)	
<i>Plaintiffs,</i>	)	Civil Action No. 3:15 CV 00357 HEH
	)	
v.	)	
	)	
VIRGINIA STATE BOARD	)	
OF ELECTIONS, et al.,	)	
	)	
<i>Defendants.</i>	)	
	)	

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**MOTION TO QUASH SUBPOENA AND/OR FOR PROTECTIVE ORDER  
OF TERESA F. SMITHSON, GENERAL REGISTRAR**

Pursuant to Fed. R. Civ. P. 45(d)(3)(A), non-parties Teresa F. Smithson, General Registrar, and the Hanover County Electoral Board, by and through the undersigned counsel, hereby move this Court to quash the subpoena *duces tecum* issued by the Plaintiffs on September 21, 2015, and/or issue a protective order with respect to such subpoena.

For the reasons outlined in the attached Memorandum in Support, this Court should quash the subpoena *duces tecum* because it is overly broad and unduly burdensome, and/or issue a protective order with respect to the subpoena to narrow the scope to permissible bounds.

TERESA F. SMITHSON,  
GENERAL REGISTRAR, ET AL.

By: \_\_\_\_\_/s/\_\_\_\_\_  
Counsel

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and Hanover County Electoral Board*

**CERTIFICATE OF SERVICE**

I hereby certify that on October 7, 2015, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing to all counsel of record.

Respectfully submitted,

\_\_\_\_\_/s/\_\_\_\_\_  
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